

1 BARRY J. PORTMAN  
Federal Public Defender  
2 CYNTHIA C. LIE  
Assistant Federal Public Defender  
3 160 West Santa Clara Street, Suite 575  
San Jose, CA 95113  
4 Telephone: (408) 291-7753  
5 Counsel for Defendant ESCOBAR

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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) No. CR-07-00437 JF  
11 )  
Plaintiff, ) STIPULATION AND [PROPOSED]  
12 ) ORDER CONTINUING HEARING  
vs. )  
13 )  
CARLOS ESCOBAR, )  
14 )  
Defendant. )  
15 \_\_\_\_\_)

16 **STIPULATION**

17 The parties hereby stipulate and agree that the status hearing in the above-captioned  
18 matter, currently set for Wednesday, August 1, 2007, may be continued to Wednesday, August  
19 29, 2007 at 9:00 a.m. The reason for the requested continuance is that the parties are in  
20 discussions regarding a fast-track disposition of this case, but require additional time to resolve  
21 issues regarding the appropriate calculation of the fast-track sentence for a plea agreement  
22 pursuant to Rule 11(c)(1)(C).

23 The parties further stipulate and agree that 28 days may be excluded from the time within  
24 which trial shall commence under the Speedy Trial Act, 18 U.S.C. §§3161(h)(8)(A) and  
25 (h)(8)(B)(iv), for the effective preparation of counsel.  
26

1 Dated: July 30, 2007

2 s/\_\_\_\_\_  
3 CYNTHIA C. LIE  
Assistant Federal Public Defender

4 Dated: July 31, 2007

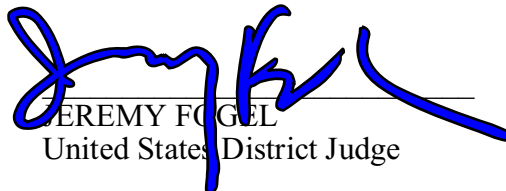
5 s/\_\_\_\_\_  
6 BENJAMIN KENNEDY  
Assistant United States Attorney

7  
8 **[PROPOSED] ORDER**

9 Good cause appearing and by stipulation of the parties, it is hereby ordered that the initial  
10 district court appearance in the above-captioned matter shall be continued from August 1, 2007  
11 to Wednesday, August 29, 2007 at 9:00 a.m.

12 It is further ordered that 28 days shall be excluded from the time within which trial shall  
13 commence under the Speedy Trial Act, 18 U.S.C. §§3161(h)(8)(A) and (h)(8)(B)(iv), as the time  
14 reasonably necessary for effective preparation of counsel.

15 Dated: July 31, 2007

16   
17 JEREMY FOGEL  
United States District Judge